

THOMAS A. JOHNSON, #119203  
Law Office of Thomas A. Johnson  
400 Capitol Mall, Suite 2560  
Sacramento, California 95814  
Telephone: (916) 422-4022  
Email: [taj@tomjohnsonlaw.com](mailto:taj@tomjohnsonlaw.com)

Attorney for Emmanuel Nava

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,  
Plaintiff,  
vs.  
EMMANUEL NAVA and JOSE PEDRO  
NAVA,  
Defendants.

Case No.: 2:24-cr-00054-DJC  
STIPULATION REGARDING  
EXCLUDABLE TIME PERIODS  
UNDER SPEEDY TRIAL ACT AND  
ORDER  
Date: September 19, 2024  
Time: 9:00am  
Judge: Hon Judge Daniel J. Calabretta

## STIPULATION

1. By previous order, this matter was set for status on September 19, 2024.
2. By this stipulation, the defendants now move to continue the status conference until October 31, 2024, at 9:00 a.m., and to exclude time between September 19, 2024, and October 31, 2024 under Local Codes T2 and T4.
3. The parties agree and stipulate, and request that the Court find the following:
  - a) Counsel for the defendants desire additional time to review offers from the US Attorney's Office.

1 b) Counsel for the defendants believe that failure to grant the above-requested  
2 continuance would deny them the reasonable time necessary for effective  
3 preparation, taking into account the exercise of due diligence.  
4 c) The government does not object to the continuance.  
5 d) Based on the above-stated findings, the ends of justice served by continuing  
6 the case as requested outweigh the interest of the public and the defendant in a  
7 trial within the original date prescribed by the Speedy Trial Act.  
8 e) For the purpose of computing time under the Speedy Trial Act, 18  
9 U.S.C. § 3161, et seq., within which trial must commence, the time period of  
10 September 19, 2024 to October 31, 2024, inclusive, is deemed excludable  
11 pursuant to 18 U.S.C. § 3161(h)(7)(A), B(ii), (iv) [Local Code T2 and T4]  
12 because this is a complex case and it results from a continuance granted by the  
13 Court at defendant's request on the basis of the Court's finding that the ends of  
14 justice served by taking such action outweigh the best interest of the public and  
15 the defendant in a speedy trial.  
16 4. Nothing in this stipulation and order shall preclude a finding that other provisions  
17 of the Speedy Trial Act dictate that additional time periods are excludable from  
18 the period within which a trial must commence.

19  
20 **IT IS SO STIPULATED.**

21  
22  
23 DATED: September 6, 2024

24 PHILLIP A. TALBERT  
United States Attorney

25 /s/ Emily Sauvageau  
26 EMILY SAUVAGEAU  
27 Assistant U.S. Attorney  
28

1 DATE: September 6, 2024

2 /s/ Thomas A. Johnson  
3 THOMAS A. JOHNSON  
4 Attorney for Emmanuel Nava

5 DATE: September 6, 2024

6 /s/ Neat Allen Sawyer  
7 NEAT ALLEN SAWYER  
8 Attorney for Jose Pedro Nava

14 **ORDER**

15 IT IS SO FOUND AND ORDERED this 6<sup>th</sup> day of September 2024

16 Dated: September 6, 2024

17 /s/ Daniel J. Calabretta

18 THE HONORABLE DANIEL J. CALABRETTA  
19 UNITED STATES DISTRICT JUDGE